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7 *Attorneys for Defendant*
8 FOUNDEVER OPERATING CORPORATION

9
10 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

11 JASHYUA THOMAS,

12 Plaintiff,

13 v.

14 FOUNDEVER OPERATING
15 CORPORATION, a corporation, and DOES 1-
50, inclusive,

16 Defendants.

Case No. 2:25-cv-00152-APG-BNW

**STIPULATION FOR EXTENSION OF
TIME TO FILE RESPONSE TO
OPPOSITION TO THE PARTIAL
MOTION TO DISMISS**

(FIRST REQUEST)

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18 Plaintiff JASHYUA THOMAS (“Plaintiff”) and Defendant FOUNDEVER OPERATING
19 CORPORATION (“Defendant”), by and through their undersigned counsel, hereby agree and
20 stipulate to extend the time for Defendant to file a response to the Opposition to the Partial Motion
21 to Dismiss in this case. Defendant’s current deadline to file a Response to the Opposition to the
22 Partial Motion to Dismiss runs on March 10, 2025. The Parties have agreed to allow Defendant up
23 to and including **March 17, 2025**, to which to file their response. The instant request for an
24 extension is necessary as defense counsel will be traveling for a previously scheduled court hearing,
25 and the additional time will allow defense counsel adequate time to prepare the Reply.

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1 This is the first request for an extension of time to respond to the Opposition to the Partial
2 Motion to Dismiss. This request is made in good faith and not for the purpose of delay.

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4 Dated: March 6, 2025

Dated: March 6, 2025

5 Respectfully submitted,

Respectfully submitted,

6
7 /s/ Kathryn L. Bain, Esq.

8 KATHRYN L. BAIN, ESQ.
BAIN MAZZA & DEBSKI LLP

9 *Attorneys for Plaintiff*
JASHYUA THOMAS

/s/ Luke W. Molleck, Esq.

10 ROGER L. GRANGENETT II, ESQ.
LUKE W. MOLLECK, ESQ.
LITTLER MENDELSON, P.C.

11 *Attorney for Defendant*
FOUNDEVER OPERATING CORPORATION

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14 IT IS SO ORDERED:

15 Dated: March 7, 2025

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18 ANDREW P. GORDON
CHIEF UNITED STATES DISTRICT JUDGE